

Exhibit 3

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

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March 27, 2024

Via Electronic Mail

Katherine R. Katz
Kirkland & Ellis LLP
1301 Pennsylvania Avenue, NW
Washington, D.C. 20004
Katherine.katz@kirkland.com

Re: *In re: Dealer Management Systems Antitrust Litigation*,
MDL No. 2817 (N.D. Ill.)

Dear Kate:

I write in response to your March 25th letter regarding the production of the Authenticom refresh data. You asked for a response by today, which we are providing.

Authenticom voluntarily produced data to refresh the invoice and connections data on which Dr. Israel relied in his August 26, 2019 expert report up to and including September 2023. There was no subpoena served on Authenticom and so no notice was due under Federal Rule of Civil Procedure 45(a)(4). As you will recall, Kellogg Hansen has represented Authenticom in this case since 2017. Any communications between them would be protected by both the attorney-client privilege and the work product doctrine. Without waiving those or any other protections, however, we can confirm that we now have produced all new and discoverable Authenticom data in our possession, and that we have no other outstanding document or data requests to any third party.

We note that CDK produced abundant data and other documents from its own files after Dr. Israel provided his class certification report and after Dr. Israel was deposed. Much of the data and documents that CDK produced (and relied on its briefing and expert report) were not even contemplated as part of the class certification discovery (unlike the Authenticom data which mirrors the data refresh productions provided by CDK and Reynolds).

In the spirit of cooperation, we may be willing to provide some of the additional information requested in your letter if you can help us understand whether there is any authority that would require us to provide such information and if CDK will agree that responding to any questions is not a waiver of privilege.

Very truly yours,

/s/ Daniel V. Dorris

Daniel V. Dorris